

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

MATTHEW A. PARRELLA (NYBN 2040855)
Assistant United States Attorney

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5042
FAX: (408) 535-5066
matthew.parrella@usdoj.gov

Attorneys for United States of America

FILED
JAN 27 2014
HILARY W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

CR-13-00703-LH/L

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

ADRIAN BALTAGA,
GHEORGHE BALTAGA,
Defendants.

UNITED STATES' MOTION TO UNSEAL
DOCUMENTS AND ~~PROPOSED~~ ORDER

UNDER SEAL

The government hereby moves this Court to unseal the items under the following
dockets:

CR 12-90147 MISC – HRL
CR 12-90268 MISC – HRL
CR 12-90372 MISC – PSG
CR 12-90373 MISC – PSG
CR 12-90434 MISC – HRL
CR 12-90503 MISC – PSG
CR 12-90592 MISC – HRL

CR 12-90593 MISC – HRL
CR 12-90676 MISC – NMC
CR 12-90712 MISC – HRL
CR 12-90809 MISC – PSG
CR 12-90809-renewal – PSG
CR 12-90832 MISC – HRL
CR 12-90832 MISC – Extended -- PSG
CR 12-90834 MISC – HRL
CR 13-70237 – HRL
CR 13-70238 – HRL
CR 13-90108 MISC – PSG
CR 13-90108 MISC-extension – NMC
CR 13-90108 MISC-extension – HRL
CR 13-90108 MISC-extension – HRL
CR 13-90236 MISC – HRL
CR 13-90284 MISC – PSG
CR 13-90284 MISC-extension – HRL
CR 13-90284 MISC-extension – HRL
CR 13-90387 MISC – HRL
CR 13-90677MISC – PSG
CR 13-90681MISC –PSG
CR 13-90736 MISC –PSG

///

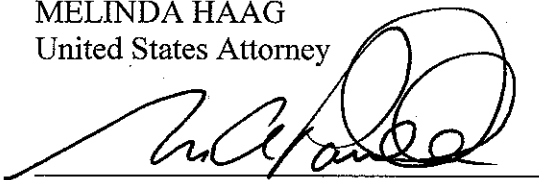
///

///

1 The basis for this application is that the covert phase of this investigation is complete, the
2 defendants have been indicted, and the government needs to complete discovery obligations under Rule
3 16. In order to complete said obligations, the government needs to disclose the above-referenced items.
4 The materials no longer need to remain sealed to the public.

5
6 DATED: January 23, 2014 Respectfully submitted,

7
8 MELINDA HAAG
United States Attorney

9
10 
11 MATTHEW A. PARRELLA
Assistant United States Attorney

[PROPOSED] ORDER

Based upon the motion of the government and for good cause shown, IT IS HEREBY ORDERED that the items under the following dockets, as well as this application and order, be UNSEALED:

CR 12-90147 MISC – HRL
CR 12-90268 MISC – HRL
CR 12-90372 MISC – PSG
CR 12-90373 MISC – PSG
CR 12-90434 MISC – HRL
CR 12-90503 MISC – PSG
CR 12-90592 MISC – HRL
CR 12-90593 MISC – HRL
CR 12-90676 MISC – NMC
CR 12-90712 MISC – HRL
CR 12-90809 MISC – PSG
CR 12-90809-renewal – PSG
CR 12-90832 MISC – HRL
CR 12-90832 MISC – Extended -- PSG
CR 12-90834 MISC – HRL
CR 13-70237 – HRL
CR 13-70238 – HRL
CR 13-90108 MISC – PSG
CR 13-90108 MISC-extension – NMC
CR 13-90108 MISC-extension – HRL
CR 13-90108 MISC-extension – HRL
CR 13-90236 MISC – HRL
CR 13-90284 MISC – PSG

1 CR 13-90284 MISC-extension – HRL

2 CR 13-90284 MISC-extension – HRL

3 CR 13-90387 MISC – HRL

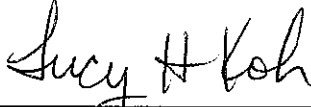
4 CR 13-90677MISC – PSG

5 CR 13-90681MISC –PSG

6 CR 13-90736 MISC –PSG

7
8 IT IS SO ORDERED.

9
10 DATED: 1/24/14



LUCY H. KOH
United States District Court Judge